



United States Attorney
Southern District of New York

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December 5, 2024

BY ECF

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Sean Combs, 24 Cr. 542 (AS)*

Dear Judge Subramanian:

Pursuant to the Court's Individual Rules, the Government respectfully submits this letter motion to request an adjournment of the briefing schedule in connection with the motion filed by the defendant last night. (See Dkt. No. 97). By order dated November 19, 2024, the Court set the following briefing schedule for the defendant's application relating to the notes photographed at the MDC:

- Defense motion due December 4, 2024
- Government opposition due December 9, 2024
- Defense reply due December 11, 2024

The Government proposes the following adjournment, which would provide the Government a similar amount of time to respond to the defendant's brief as the defendant had to draft and file his brief:

- Government opposition due December 20, 2024
- Defense reply due December 27, 2024

The Government respectfully submits that the proposed schedule will afford the Government adequate time to respond to the myriad issues raised in the defendant's brief. Specifically, given that the Government's Case Team cannot respond to certain arguments advanced in the defendant's brief regarding privilege because the Case Team is no longer in possession of the notes at issue, the Government must add an Assistant United States Attorney to the Filter Team to take on that response. Additionally, given the breadth and scope of the extraordinary relief requested by the defendant, an adjournment is appropriate. Moreover, the defendant will suffer no prejudice given that the Case Team is no longer in possession of the notes at issue.

GRANTED. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 100.

SO ORDERED.

Arun Subramanian, U.S.D.J.

Date: December 6, 2024

This is the first request for an adjournment. The Government has asked defense counsel for their position on the Government's request, but has not received a response. The parties are scheduled to appear before the Court on December 18, 2024 at 2:00 p.m.

Respectfully submitted,

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